

**IN THE CIRCUIT COURT FOR  
ANNE ARUNDEL COUNTY, MARYLAND**

NEIL PARROTT, RAY SERRANO, \*  
CAROL SWIGAR, DOUGLAS RAAUM, \*  
RONALD SHAPIRO, DEANNA \*  
MOBLEY, GLEN GLASS, ALLEN \*  
FURTH, JEFF WARNER, JIM NEALIS, \*  
DR. ANTONIO CAMPBELL, and \*  
SALLIE TAYLOR, \*

Plaintiffs,

Case No. C-02-CV-21-001773

v.

LINDA H. LAMONE, in her official \*  
capacity as State Administrator of the \*  
Maryland State Board of Elections and \*  
WILLIAM G. VOELP, Chair of the \*  
Maryland State Board of Elections, and \*  
STATE OF MARYLAND, \*

Defendants.

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**PLAINTIFFS' SUPPLEMENTAL MEMORANDUM**

Plaintiffs Neil Parrott, Ray Serrano, Carol Swigar, Douglas Raaum, Ronald Shapiro, Deanna Mobley, Glen Glass, Allen Furth, Jeff Warner, Jim Nealis, Dr. Antonio Campbell, and Sallie Taylor ("Plaintiffs") respectfully submit this Supplemental Memorandum pursuant to the Court's *ore tenus* order on February 16, 2022.

During the course of the February 16, 2022 hearing, the Court identified two sessions laws that it considered may impact the questions raised in these proceedings. Those sessions laws are 1788 Laws of Maryland, Chapter X, Section III (Vol. 204, p. 318)

and 1843 Session Laws, Chapter 16, Section 5 (Vol. 595, p. 13). Plaintiffs respectfully submit that Plaintiffs have been unable to locate any information to provide further clarity related to these two session laws.

February 18, 2022

Respectfully Submitted,

/s/ Eric W. Lee

Eric W. Lee

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### CERTIFICATE OF SERVICE

I certify that on February 18, 2022 the foregoing Plaintiffs' Supplemental Memorandum was filed and served electronically via the Court's MDEC system, and served by e-mail to counsel for Plaintiffs in *Szeliga v. Lamone* at the following address:

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/s/ Eric W. Lee  
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